UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

STEPHEN McCOLLUM, and SANDRA	§	
McCOLLUM, individually, and STEPHANIE	§	
KINGREY, individually and as independent	§	
administrator of the Estate of LARRY GENE	§	
McCOLLUM,	§	
PLAINTIFFS	§	
	§	
V.	§	CIVIL ACTION NO.
	§	4:14-cv-3253
	§	JURY DEMAND
BRAD LIVINGSTON, JEFF PRINGLE,	§	
RICHARD CLARK, KAREN TATE,	§	
SANDREA SANDERS, ROBERT EASON, the	§	
UNIVERSITY OF TEXAS MEDICAL	§	
BRANCH and the TEXAS DEPARTMENT OF	§	
CRIMINAL JUSTICE.	§	
DEFENDANTS	§	

Plaintiffs' Consolidated Summary Judgment Response Appendix

EXHIBIT 201

SELF-AUTHENTICATING NO BUSINESS RECORDS AFFIDAVIT:

AFFIDAVIT OF EAC INCIDENT RECORDS

"My name is Linda Cole and I am an employee of the TDCJ, a governmental agency. I am executing this declaration as part of my assigned duties and responsibilities. I declare under penalty of perjury that the following is true and correct. I am over 21 years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts stated herein.

"I am the custodian of records for the Emergency Action Center of the Texas Department of Criminal Justice ("TDCJ"). I have been requested to provide true and correct copies of all EAC reports from records kept by the TDCJ in the regular course of its business activity. Pertaining to the investigation into the deaths of Moore, James #573468 DOD 7/30/1998, White, Archie #536796 DOD 6/30/1998 and Lopez, Amselmo #533894 DOD 7/14/1998, the records have been purged pursuant to records retention. There are no documents responsive to this request."

Executed in Walker, State of Texas, on the 5th day of February, 2014.

Linda Cole

Supervisor

Emergency Action Center

Texas Department of Criminal Justice